

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

DOC # 93

UNITED STATES OF AMERICA,

v.

DOMINICK P. CAROLLO, STEVEN E.
GOLDBERG, and PETER S. GRIMM,

Defendants.

10-CR-0654 (HB)

**MOTION TO ADMIT CHRISTOPHER.
R. HALL, ESQ. *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Abigail Lauer, Esq., a member in good standing of the Bar of this Court, hereby move on behalf of David Eckhart and Investment Management Advisory Group, Inc. for an Order allowing the admission *pro hac vice* of:

Christopher R. Hall, Esq.
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Phone: (215) 972-7180
Fax: (215) 972-1917
E-mail: chall@saull.com

FILED
U.S. DISTRICT COURT
2011 DEC -2 PM 1:52
S.D. OF N.Y.

Christopher R. Hall, Esq. is a member of good standing of the Bar of the Commonwealth of Pennsylvania, the State of New Jersey, the U.S. District Court for the Eastern District of Pennsylvania, U.S. District Court for New Jersey, and the U.S. Court of Appeals for the Third Circuit. There are no pending disciplinary proceedings against Christopher R. Hall, Esq. in any State or Federal Court.

Dated: December 2, 2011

City, State: Newark, New Jersey

Respectfully submitted,


Abigail Lauer, Esq.
SDNY Bar: AL-8968
Saul Ewing LLP
One Riverfront Plaza, Suite 1520
Newark, New Jersey 07102
Phone: 973.286.6716
Fax: 973.286.6816
E-mail: alauer@saul.com

**UNITED STATES DISTRICT COURT FOR THE
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**DECLARATION OF
ABIGAIL LAUER, ESQ.**

I, Abigail Lauer, Esq., hereby declare the following under penalty of perjury:

1. I am an Associate at the law firm of Saul Ewing LLP, counsel for movants David Eckhart and Investment Management Advisory Group, Inc. (collectively, "IMAGE") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of movant IMAGE's motion to admit Christopher R. Hall, Esq. as counsel *pro hac vice* to represent IMAGE in this matter.

2. I am a member in good standing of the Bar of the State of New York and have been since being admitted in 2007. I am also admitted to, and a member in good standing of, the Bar of the State of New Jersey, the United States District Court for the District of New Jersey, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States Court of Appeals for the Sixth Circuit.

3. Christopher R. Hall, Esq. is also a Partner at Saul Ewing LLP, in Philadelphia, Pennsylvania. I attach an Affirmation from Mr. Hall in Support of the Notice of Motion to admit Counsel *Pro Hac Vice* as Exhibit 1.

4. I have found Mr. Hall to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Christopher R. Hall, Esq., *pro hac vice*. I attach a Certificate of Good Standing from the Commonwealth of Pennsylvania as Exhibit 2, a Certificate of Good Standing from the U.S. District Court for the Eastern District of Pennsylvania as Exhibit 3, a Certificate of Good Standing from the Supreme Court of New Jersey as Exhibit 4, and a Certificate of Good Standing from the U.S. Court of Appeals for the Third Circuit as Exhibit 5.

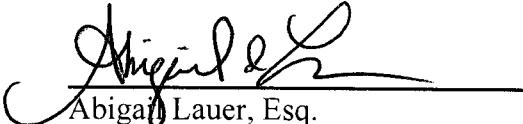
6. I respectfully submit a proposed order granting the admission of Christopher R. Hall, Esq., *pro hac vice*, which is attached hereto as Exhibit 6.

7. I declare the foregoing statements are true under penalty of perjury under the laws of the United States of America.

WHEREFORE it is respectfully requested that the motion to admit Christopher R. Hall, Esq. *pro hac vice*, to represent IMAGE in the above captioned matter be granted.

Dated: December 2, 2011

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Abigail Lauer', is written over a horizontal line.

Abigail Lauer, Esq.
SDNY Attorney I.D.: AL-8968
Saul Ewing LLP
One Riverfront Plaza, Suite 1520
Newark, New Jersey 07102
Phone: 973.286.6716
Fax: 973.286.6816
E-mail: alauer@saul.com

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**AFFIRMATION OF
CHRISTOPHER R. HALL, ESQ.**

CHRISTOPHER R. HALL, ESQ. solemnly affirms and says:

1. I am a Partner at the law firm of Saul Ewing LLP. My Firm's principal address is Centre Square West, 1500 Market Street, 38th Floor, Philadelphia, Pennsylvania 19102. My business telephone is (215) 972-7180.
2. I received my law degree in 1985 from Georgetown University Law Center.
3. I have been licensed to practice law in the Commonwealth of Pennsylvania since 1991. My Pennsylvania Attorney Registration No. is 64912. I have also been licensed to practice in the U.S. Court of Appeals for the Third Circuit since 1991, the U.S. District Court for the Eastern District of Pennsylvania since 1991 and U.S. District Court of New Jersey since 2007.
4. I am, and always have been, a member in good standing of all Courts to which I have been admitted.
5. A recent Certificate of Good Standing from the Commonwealth of Pennsylvania is attached as Exhibit 2 to the Declaration of Abigail Lauer, Esq. as well as a recent Certificate of Good Standing from the U.S. District Court for the Eastern District of Pennsylvania attached as Exhibit 3, a recent Certificate of Good Standing from the Supreme Court of

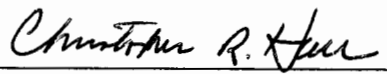
New Jersey attached as Exhibit 4, and a recent Certificate of Good Standing from the U.S. Court of Appeals for the Third Circuit attached as Exhibit 5.

6. I have become familiar with the standards of professional conduct imposed upon members of the New York Bar and relevant statutes, rules and procedures, and I will abide by them.

7. Having spoken directly with my client on this matter, I represent to the Court that my client has full confidence in my legal abilities and wishes for me to participate as its counsel in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 17, 2011


CHRISTOPHER R. HALL, ESQ



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Christopher R. Hall, Esq.

DATE OF ADMISSION

June 15, 1992

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 29, 2011

Patricia A. Johnson

Patricia A. Johnson
Chief Clerk

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Christopher R. Hall , Bar # 64912 , was duly admitted to practice in said Court on February 21, 2008 , and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on November 29, 2011.

BY Aida Ayala
Aida Ayala, Deputy Clerk

Supreme Court of New Jersey



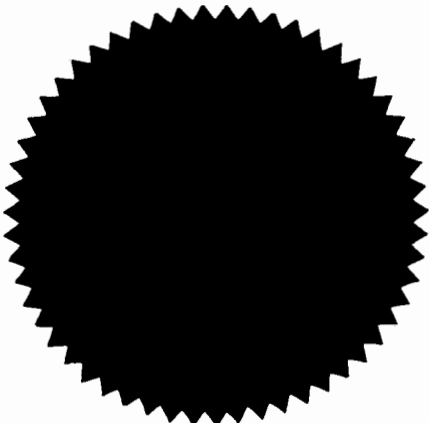
Certificate of Good Standing

This is to certify that **CHRISTOPHER R HALL**
(No. **040522007**) *was constituted and appointed an Attorney at Law of New Jersey on* **November 19, 2007** *and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.*

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
28TH day of November, 20 11.*



Mark [Signature]
Clerk of the Supreme Court

**UNITED STATES COURT OF APPEALS FOR
THE THIRD CIRCUIT
CERTIFICATE OF GOOD STANDING**

I, MARCIA M. WALDRON, Clerk of the United States Court of Appeals for the Third Circuit, DO HEREBY CERTIFY THAT **Christopher R. Hall** was admitted to practice before this Court as an attorney and counselor on **August 19, 1996** he or she has never been suspended nor disbarred, and is presently a member of the bar of this Court in good standing.

I DO FURTHER CERTIFY that there are no grievances or complaints pending before the Disciplinary Committee of this Court against said attorney and counselor.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the seal of the said Court, at Philadelphia, this 29th day of November 2011.

MARCIA M. WALDRON, Clerk
United States Court of Appeals
For the Third Circuit

By: 

Patricia S. Dodszeuweit
Chief Deputy Clerk

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Defendants.

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ORDER

Upon the motion of Saul Ewing LLP, attorneys for movants David Eckhart and Investment Management Advisory Group, Inc., and said sponsor's declaration in support:

IT IS HEREBY ORDERED that

Christopher R. Hall, Esq.
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Phone: (215) 972-7180
Fax: (215) 972-1917
E-mail: chall@saul.com

is admitted to practice *pro hac vice* as counsel for movants David Eckhart and Investment Management Advisory Group, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____

City, State: New York, New York

Harold Baer, U.S.D.J.

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PROOF OF SERVICE

I, Abigail Lauer, Esq., hereby certify that on December 2, 2011, I caused the within Motion To Admit Christopher R. Hall, Esq. along with supporting documents to be served upon the following counsel of record via Federal Express, overnight delivery to:

Walter F. Timpone
Walter R. Krzastek, Jr.
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Attorneys for United States


ABIGAIL LAUER